

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED
IN CLERKS OFFICE

2004 JUN 17 P 4:18

WILLIAM RYAN and JOHN J. SHAUGHNESSY,
as they are TRUSTEES, INTERNATIONAL UNION
OF OPERATING ENGINEERS LOCAL 4 HEALTH
AND WELFARE, PENSION AND ANNUITY FUNDS,
and LOUIS G. RASETTA and CHRISTOPHER
BARLETTA, as they are TRUSTEES, HOISTING AND
PORTABLE ENGINEERS LOCAL 4 APPRENTICE
AND TRAINING FUNDS and INTERNATIONAL
UNION OF OPERATING ENGINEERS, LOCAL 4,
Plaintiffs

vs.

MKM SITE DEVELOPMENT CORP.,
Defendant

U.S. DISTRICT COURT
DISTRICT OF MASS.

C.A. No. 03-12248 RWZ

MOTION FOR EXTENSION OF TIME TO FILE
FOR ENTRY OF DEFAULT JUDGMENT

Plaintiffs William Ryan and John J. Shaughnessy, as they are Trustees, International Union of Operating Engineers Local 4 Health and Welfare Fund, et al., herein respectfully move this honorable Court for an extension of time until June 24, 2004 in which to file Plaintiffs' Motion for Entry of Default Judgment. As grounds therefore, Plaintiffs state as follows:

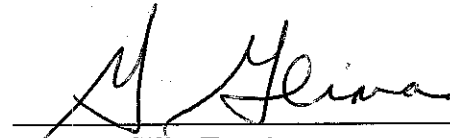
1. The Plaintiffs have experienced an unanticipated delay in receipt of the necessary affidavits in support of their Motion.

WHEREFORE, Plaintiffs seek an extension of time until June 24, 2004 in which to file for Entry of Default Judgment in this matter.

Respectfully submitted,

WILLIAM RYAN and JOHN J. SHAUGHNESSY,
as they are TRUSTEES, I.U.O.E. LOCAL 4
HEALTH AND WELFARE FUND, et al,

By their attorneys,



Anne R. Sills, Esquire

BBO #546576

Gregory A. Geiman, Esquire

BBO #655207

Segal, Roitman & Coleman

11 Beacon Street

Suite #500

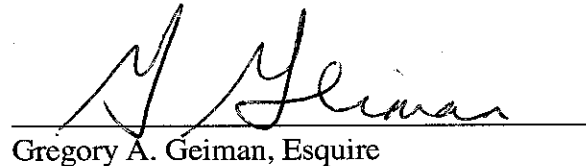
Boston, MA 02108

(617) 742-0208

Dated: June 17, 2004

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above Motion for Extension of Time to File for Entry of Default Judgment has been served by certified and first class mail upon MKM Site Development Corp. at 69 Milk Street, Suite #200, Westborough, MA 01581 this 17th day of June, 2004.



Gregory A. Geiman, Esquire